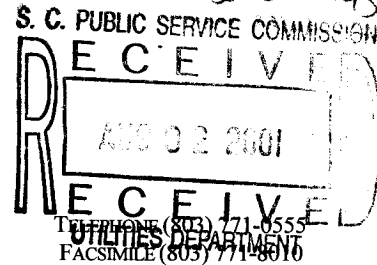


ELLIOTT & ELLIOTT, P.A.
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SCOTT ELLIOTT

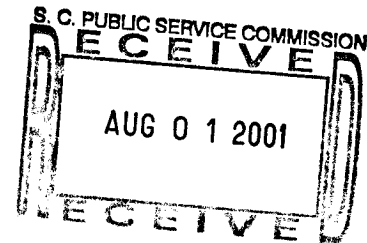
129647



August 1, 2001

VIA HAND DELIVERY

Mr. Gary E. Walsh
Executive Director
South Carolina Public Service Commission
101 Executive Center Drive
Post Office Drawer 11649
Columbia, South Carolina 29211



Re: *Application of BellSouth Telecommunications, Inc., to Provide In-Region InterLATA Services
Pursuant to Section 271 of the Telecommunications Act of 1996
Docket No. 2001-209-C*

Dear Mr. Walsh:

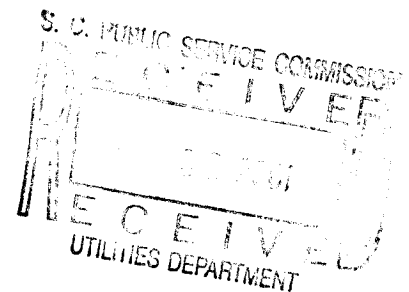
Enclosed for filing with the Commission are the original and seven (7) copies of the Motion of Sprint Communications Company, L.P. and United Telephone Company of the Carolinas to Postpone the August 27, 2001, Hearing and Requesting Oral Argument in this matter. All parties of record are being served as is indicated in the Certificate of Service attached to this Motion.

Should you have any questions regarding this filing, please call me at your convenience.

Sincerely Yours,

ELLIOTT & ELLIOTT, P.A.

SCOTT ELLIOTT



SE:ab
Encl.

cc: All Parties of Record

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8/2/01

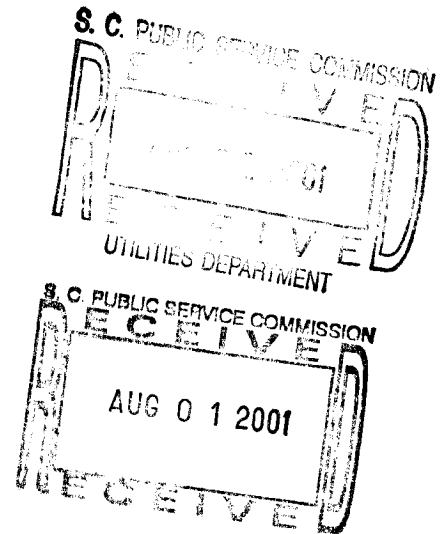
ACCEPTED
Legal 8/2/01 g/b

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2001-209-C

In Re:

Application of BellSouth Telecommunications, Inc.
to Provide In-Region InterLATA Services Pursuant
to Section 271 of the Telecommunications Act of 1996



MOTION OF SPRINT COMMUNICATIONS COMPANY, L.P.
AND UNITED TELEPHONE COMPANY OF THE CAROLINAS
TO POSTPONE THE AUGUST 27, 2001, HEARING
AND REQUESTING ORAL ARGUMENT

On July 27, 2001, AT&T filed its Motion on Behalf of AT&T Communications of the Southern States, Inc. to Postpone the August 27, 2001 Hearing in this matter ("AT&T's Motion"). As stated in AT&T's Motion, this Commission has established a procedural schedule in this docket that includes an August 27, 2001, hearing to address performance data and measures and OSS testing in Georgia and Florida. Subsequently, the Commission ruled on July 27, 2001, that additional testimony will be taken on August 23 and 24, 2001.

Sprint joins AT&T in moving to reschedule the August 27, 2001, hearing and proposing that the Commission issue a revised procedural schedule when information from third party testing in other states, specifically Georgia and Florida, becomes available and performance measures have been adopted by this Commission.

RETURN DATE
SERVICE: OK HO

As stated in Sprint's previous filings in this matter (see: United Telephone of the Carolinas' and Sprint Communications Company, L.P.'s Petition to Intervene and for Order Soliciting Comments on Proposed Hearing Schedule submitted May 21, 2001; and letter to Gary E. Walsh from Scott Elliott dated June 11, 2001), this proceeding is of great importance, not only to the companies involved, but to the people of South Carolina as well. The issues are complex, the filings are voluminous, and the Commission is acting, at least in part, in reliance on the results of operational support system (OSS) testing being performed in other states. These tests still have not yet been completed and fully reported upon. As is also indicated in Sprint's previous filings, simple due process requires that the testimony scheduled for August 27 not proceed until such time as OSS testing is completed so that the parties will have sufficient time to review the results of those tests and present evidence regarding them.

The wisdom of delaying consideration of OSS testing and performance measures issues currently scheduled for hearing the week of August 27 is evidenced by the actions, outlined in some detail in AT&T's Motion, of other state commissions in the BellSouth region who have decided to proceed only after the Georgia commission issues its final order. Among the states which have decided to delay proceeding on these issues pending Georgia or other OSS test results are Alabama, North Carolina, and Tennessee. In addition to OSS testing, performance measures should be in place and should be subjected to Commission review prior to proceeding with the testimony originally scheduled for the week of August 27.

The Commission should defer the hearing currently scheduled for August 27 until such time as OSS testing is, as a minimum, complete in Georgia and Florida. The action requested by Sprint is consistent with the Section 271 Motion of Commissioner James Blake Atkins,

Ph.D., dated June 12, 2001, in which the "(p)arties are strongly encouraged to provide detailed arguments, analysis, data and exhibits during the August hearing regarding differences in Georgia and Florida 271 third party testing and performance measures." As provided in the Commission's Order (2001-647) of July 10, 2001, testimony for the August hearing is due on August 13. Clearly, the parties cannot provide such detailed arguments, analysis, data, or exhibits if tests in Georgia and Florida are incomplete and not fully reported.

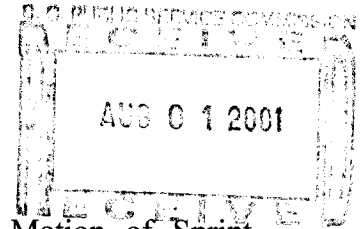
For the reasons set forth above and as more completely set forth in AT&T's Motion, Sprint moves the Commission to delay that portion of the hearing in this matter currently scheduled for August 27, 2001, until such time as OSS testing in Georgia and Florida is completed and final orders are entered in such states and until such time as performance measures are established in South Carolina and sufficient results have been subjected to appropriate review. Sprint further moves the Commission to set this Motion for oral argument at the earliest convenient opportunity.

Respectfully submitted this 1st day of August, 2001.

A handwritten signature in black ink, appearing to read "Scott Elliott", written over a horizontal line.

Scott Elliott
Attorney at Law
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Telephone: 803-771-0555
FAX: 803-771-8010

CERTIFICATE OF SERVICE



I hereby certify that I have served a copy of the foregoing Motion of Sprint Communications Company L.P. and United Telephone Company of the Carolinas upon all parties of record by depositing a copy addressed to each in the United States Mail, first-class postage prepaid.

This 1st day of August, 2001.

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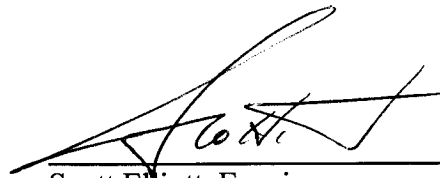
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Communications, Inc.

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A handwritten signature in black ink, appearing to read 'Scott Elliott', is written over a horizontal line.

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